

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
IN ADMIRALTY**

COMMODITIES & MINERALS  
ENTERPRISE, LTD.

Plaintiff,

vs.

C.V.G. FERROMINERA ORINOCO, C.A.

Defendant.

Civil Action No.: 16-cv-00861-ALC

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Diaz, Reus & Targ, LLP's ("DRT") motion for leave to withdraw as counsel of record, and the accompanying declarations of Marta Colomar Garcia and Brant C. Hadaway, DRT moves this Honorable Court pursuant to Local Civil Rule 1.4 for an Order granting DRT leave to withdraw as counsel for Defendant C.V.G. Ferrominerra Orinoco, C.A. in this action, and granting such other and further relief as is just and proper.

Dated: Miami, Florida  
January 20, 2017

DIAZ, REUS & TARG, LLP  
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Telephone: (305) 375-9220

/s/ Marta Colomar Garcia

Marta Colomar Garcia (5405618)  
Michael Diaz, Jr. (Admitted Pro Hac Vice)  
Brant C. Hadaway (Admitted Pro Hac Vice)  
Gary E. Davidson (Admitted Pro Hac Vice)

*Attorneys for Defendant*  
C.V.G. Ferrominera Orinoco, C.A.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on January 20, 2017, I electronically filed the foregoing with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record and parties identified on the attached Service List, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

/s/ Marta Colomar Garcia

Marta Colomar Garcia

**SERVICE LIST**

**Commodities & Minerals Enterprise, Ltd. V. C.V.G. Ferrominera Orinoco, C.A.**

**CASE NO. 16-cv-00861-ALC**

**United States District Court, Southern District of New York**

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